

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
CHARLES SMITH BRADDY	:	
aka Charlie Braddy	:	CASE NO. 1:17-bk-02781
Debtor	:	
	:	
U.S. BANK TRUST NATIONAL	:	
ASSOCIATION, not in its Individual	:	
capacity but solely as owner trustee for	:	
RCF2 Acquisition Trust c/o U.S. Bank	:	
Trust National Association,	:	
Movant	:	
	:	
v.	:	
	:	
CHARLES SMITH BRADDY	:	
aka Charlie Braddy, Jack N.	:	
Zaharopoulos,	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.

11. Proof of default is demanded at trial and this paragraph is therefore denied. Movant's payment history fails to identify a payment made on September 2, 2022 in the amount of \$885.66. Moreover, Movant has paid \$914.21 on April 3, 2023 and a payment of \$885.66 on April 3, 2023.
12. Denied. Movant's payment history fails to identify a payment made on September 2, 2022 in the amount of \$885.66. Moreover, Movant has paid \$914.21 on April 3, 2023 and a payment of \$885.66 on April 3, 2023.
13. Proof of amount owed is demanded at trial and this paragraph is therefore denied.
14. Admitted.
15. Denied that Movant has failed to make payments, as stated above.
16. Denied that Movant has failed to make payments, as stated above.
17. Denied that Movant has demonstrated cause for relief.
18. Denied that Rule 4001(a)(3) should not be applicable and denied that the Movant should be allowed to immediately enforce and implement the Order granting relief from the automatic stay.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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